

**From:** [Heidi J.K. Fessler](#)  
**To:** [CasePoint Support](#); [Luis Alifonso](#)  
**Cc:** ["Barbara Klas"](#); [Bill Egan](#); ["Clayton Halunen"](#); ["Amy Boyle"](#)  
**Subject:** Deering v. Lockheed Matter  
**Date:** Thursday, September 16, 2021 2:22:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

Can you give access to Karah Vuebenson: email [vuebenson@halunenlaw.com](mailto:vuebenson@halunenlaw.com) and make her a client admin please. Feel free to contact me with any questions or concerns.

Best Regards,

Heidi Fessler



**Heidi J. K. Fessler**  
**Innova Law Group, PLLC**  
[hfessler@innovalawgroup.com](mailto:hfessler@innovalawgroup.com)  
**Innova Law Group, PLLC**  
Mobile: 651.278.3895  
[www.innovallawgroup.com](http://www.innovallawgroup.com)

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EXHIBIT

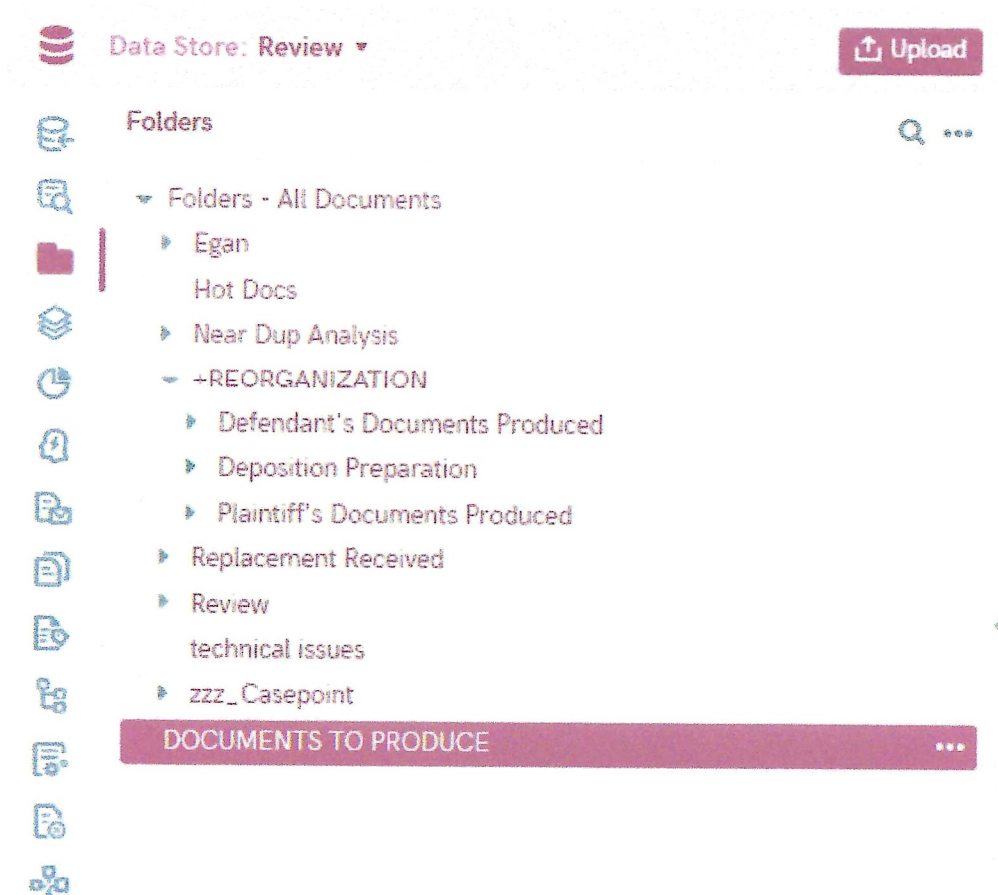
A

**From:** [Karah T. VueBenson](#)  
**To:** [Bill Egan](#)  
**Cc:** [Heidi J.K. Fessler](#)  
**Subject:** Deering - Producing Documents  
**Date:** Wednesday, March 2, 2022 3:06:35 PM  
**Attachments:** [image005.png](#)  
[Deering - COMBINED draft of docs to produced.pdf](#)

Starting a separate thread just for discussing the production of documents. Bill, once you give the OK I will work with Casepoint to produce these, hopefully by this Friday.

- Please review the attached documents and let me know if you want any redactions made or correspondence taken out/added. If you look at the docs on Casepoint you'll see where I did redactions for Dani's financial information, for some reason they didn't transfer when I converted to PDF.
  - Included in this as well is the note from Dani's current therapist, Dr. Reid, and the document Dani sent over yesterday. Note there will be dupes since we'll be included the attachments (child docs).
  - Most of the docs are saved in a folder entitled DOCUMENTS TO PRODUCE (screenshot below) in Casepoint; the letter from Dani's therapist and the document Dani sent have not been uploaded to Casepoint so they aren't there.

Thanks,  
-KVB



Karah T. VueBenson (she/her/hers)  
Litigation Support Specialist

EXHIBIT

B

*Upcoming OOO: March 14 – 18*

**halunenlaw**

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80 South 8<sup>th</sup> Street | IDS Center | Suite 1650

Minneapolis, MN 55402

Tel: (612) 605-4098 | Fax: (612) 605-4099

[Website](#) | [Email](#) | [Map](#)



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**Heidi J.K. Fessler**

---

**From:** Karah T. VueBenson <vuebenson@halunenlaw.com>  
**Sent:** Friday, March 11, 2022 3:03 PM  
**To:** Manas Badajena  
**Cc:** Heidi J.K. Fessler; Bill Egan  
**Subject:** Deering - Production Request  
**Attachments:** DD010.xlsx

Hello, please produce the documents listed in the attached spreadsheet. Below for production specifications:

- B&W tiffs, all native format EXCEPT for Word Docs. Those should be produced as near-native PDFs
- As we discussed earlier in the week, this should be labeled as production DD010 since the last production we served opposing counsel was DD009
- Apply all redactions, and add confidentiality designations in the same way as was done previously

Once the loadfile is ready please let me know. Please let me know if you have any questions and if this will be able to be performed by 7:00pm CST.

Thank you!  
-Karah

Karah T. VueBenson (she/her/hers)  
Litigation Support Specialist  
*Upcoming OOO: March 14 – 18*

**halunenlaw**

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**Heidi J.K. Fessler**

---

**From:** Karah T. VueBenson <vuebenson@halunenlaw.com>  
**Sent:** Friday, March 11, 2022 8:34 PM  
**To:** michael.burkhardt@morganlewis.com; Jacobs, Benjamin K.; donna.cao@morganlewis.com; dlewis@nilanjohnson.com; Joseph G. Schmitt  
**Cc:** Clayton Halunen; Heidi J.K. Fessler; began@avisenlegal.com; Kristina Schultz; May See Vang  
**Subject:** Deering v. Lockheed Martin Company  
**Attachments:** 2022-03-11 Deering - Service Letter for Documents Produced.pdf; 2022-03-11 Deering - COS for Documents Produced.pdf

Dear Counsel,

Please find attached hereto correspondence regarding the above-referenced matter.

Thank you,  
-Karah

Karah T. VueBenson (she/her/hers)  
Litigation Support Specialist  
*Upcoming OOO: March 14 – 18*

**halunenlaw**

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**From:** [Dani Deering](#)  
**To:** [began@avisenlegal.com](mailto:began@avisenlegal.com); [Heidi J.K. Fessler](#)  
**Subject:** Fwd: Deering Compensation Analysis.xlsx  
**Date:** Monday, October 31, 2022 2:50:24 PM  
**Attachments:** [image001.png](#)  
[Deering Compensation Analysis.xlsx](#)

---

----- Original Message -----

From: Kristina Schultz <[Schultz@halunenlaw.com](mailto:Schultz@halunenlaw.com)>  
To: Dani Deering <[damckinc@comcast.net](mailto:damckinc@comcast.net)>  
Date: 10/13/2022 8:02 AM  
Subject: Deering Compensation Analysis.xlsx

Good morning Dani,

Attached is a spreadsheet I created to track your income from 2016 to current.

I found your 2019 tax return that shows \$599K as your income. It appears to be pension income, not wages? I didn't look to closely to determine where this came from. Depending on the source, we may not be including this.

If you can fill in some of the blanks to the best of your knowledge, that would be helpful. For LM income in 2016/2017, you could use your tax returns and just fill in the totals.

Regarding Nvent, I do not know if you were there long enough to receive any bonus, so please fill in the blanks.

With Anaplan regarding value of shares for 2021/2022, fill in any bonus/vested value of shares. I assume you are on track to make about the same salary with same bonus structure for 2022 at Anaplan?

Like I said, this is just for our estimated damages calculations, it doesn't have to be exact.

Thank you for your help on this!



Kristina M. Schultz

Sr. Paralegal

**halunenlaw**

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Minneapolis, MN 55402

Tel: (612) 260-5383 | Fax: (612) 605-4099

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## DATA DISPOSITION FORM

Workspace Name: Daniel'la P Deering matter

Matter #: 105580 Data Disposition Effective Date 04/06/2022

Data Store: ☐ ECA ☒ Review ☐ Other \_\_\_\_\_

Data Disposition Options\*\*

☐ Nearline Storage ☒ Concordance Archival Format  
☐ Casepoint Archival Format ☐ Full Workspace Deletion

Special Instructions Regarding Data Disposition:

Shipping Contact Name and Address for Archive:

Please send Concordance Archive file to Karah VueBenson at Halunen Law via FTP link.

Approved By: Clayton D. Halunen

Title: \_\_\_\_\_

Signature: /s/ Clayton D. Halunen

Date: 04/06/2022

### \*\*Data Disposition Options

1. **Nearline Storage:** This option places a workspace and all associated data in an inactive state within the Casepoint Environment. Labor hour and ongoing hosting costs apply.
2. **Concordance Archival Format:** This option creates a restorable copy of all data related to a specific Casepoint workspace in Concordance format. This archive can be restored in just about any software platform. The drawback to this method is that if you want to restore this format into Casepoint it will take more time than the standard Casepoint archive format. We also are not able to preserve saved search information. We will transfer the archive either through FTP or physical media. Labor hour and physical media costs apply.
3. **Casepoint Archival Format:** This option creates a restorable copy of all data related to a specific Casepoint workspace in Casepoint format. The Casepoint archive format receives encryption and restoration in a Casepoint database ONLY. This format also offers decreased loading time as it contains all formatting for Tags, Issues, Folders, and even Saved Searches saved in the workspace. We will transfer the archive either through FTP or physical media. Labor hour and physical media costs apply.
4. **Full Workspace Deletion:** The entire database will be deleted including backups and a Certificate of Destruction will be provided. Please note, once deleted the data or work product is unrecoverable. Labor hour costs apply.

*The time to archive is determined by the type of archive, size of the workspace, quality controlling the archive and deletion, and ensuring the data is fully removed from the environment. An estimate will be provided on a case-by-case basis.*

EXHIBIT

F





# Invoice

Date: **Sep 30, 2022**  
 Invoice: **CP49825**  
 Terms: **Net 30**  
 Due Date: **Oct 30, 2022**  
 Matter Name: **Daniel'la P Deering v Lockheed to Martin Corporation et al**  
 Matter No: **272**  
 Casepoint POC: **Debra Greenleaf**  
 Billing Contact: **Bill Egan**

**Bill To:**

Avisen Legal, P.A.  
 901 Marquette Ave. S. Suite 1675  
 Suite 1675 MN 55302  
 United States

**Ship To:**

Avisen Legal, P.A.  
 901 Marquette Ave. S. Suite 1675  
 Suite 1675 MN 55302  
 United States

Description	Qty	Rate	Amount
Casepoint eDiscovery - Hosted Data - On Ice	9.72	\$15.00	\$145.80

Phone # 1-844-882-0021  
 Fax # 1-844-882-0022  
 E-mail [receivables@casepoint.com](mailto:receivables@casepoint.com)  
 Web Site [www.casepoint.com](http://www.casepoint.com)

Subtotal \$145.80

**Invoice Balance Due \$145.80**

ACH or Wire Information:  
 Bank Name: First Virginia Community Bank  
 Routing Number: 056009505  
 Account Number: 160978  
 Tax ID: 30-0503533

Check Payable to Casepoint, LLC  
 7900 Tysons One Place, 680, McLean, VA 22102





Exhibit H - Attorney-Client Privileged Communication  
(available for *in camera* review at the discretion of the Court)



**Heidi J.K. Fessler**

---

**From:** Erin Quist <erin@conardnelson.com>  
**Sent:** Thursday, November 17, 2022 10:48 AM  
**To:** Heidi J.K. Fessler  
**Cc:** Bill Egan; Kaarin Nelson Schaffer  
**Subject:** RE: Discovery Production

**Sensitivity:** Confidential

Heidi,

I just finished up training with CasePoint. It was a lot to take in on such a short amount of time, but I think I have a bit of an understanding of the system and getting the documents to CasePoint. When I told the trainer that I needed to get documents to CasePoint for processing and then production, this is what she told me to do. Please let me know if this is correct.

1. I will send an email to [mycasepoint@casepoint.com](mailto:mycasepoint@casepoint.com) with the case information, documents, and request them to be processed for production.
2. They will upload them into CasePoint.
3. They will request a custodian of records.

Will I then need to go into CasePoint and tag them for production? I remember her saying that I can tag numerous documents and email mycasepoint and let them know a production is ready.

I see that DD001-DD010 are under "Prepared Productions" in Exports and appear to be produced.

I apologize for my lack of knowledge, so I appreciate any clarity or help you can provide on the production of this next batch of documents.

Kind Regards,

**Erin D. Quist**

Paralegal | 121 South 8<sup>th</sup> Street | Suite 1425 | Minneapolis, MN 55402

Phone: (612) 808-9827 | E-mail: [erin@conardnelson.com](mailto:erin@conardnelson.com)

Website: [www.conardnelson.com](http://www.conardnelson.com)



**From:** Heidi J.K. Fessler <hfessler@innovalawgroup.com>  
**Sent:** Thursday, November 17, 2022 9:25 AM  
**To:** Erin Quist <erin@conardnelson.com>  
**Cc:** Bill Egan <began@avisenlegal.com>; Kaarin Nelson Schaffer <Kaarin@conardnelson.com>  
**Subject:** Discovery Production  
**Sensitivity:** Confidential

Let me know if you want to talk about how to get the documents to production. Feel free to call me.



Best Regards,

Heidi



**HEIDI J.K. FESSLER**

[hfessler@innovalawgroup.com](mailto:hfessler@innovalawgroup.com)

651-278-3895

[www.innovallawgroup.com](http://www.innovallawgroup.com)

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**From:** [Heidi J.K. Fessler](#)  
**To:** [Kaarin Nelson Schaffer](#); [Erin Quist](#); [Bill Egan](#)  
**Cc:** [Dani Deering](#)  
**Subject:** RE: Amended Initial Disclosures  
**Date:** Wednesday, November 16, 2022 9:41:00 AM  
**Attachments:** [Lavan annual appointment of me to corp secretary for my division 2013.pdf](#)  
[image002.png](#)  
[image003.png](#)  
[Lavan corp secretary appointments 2013 and 2016.pdf](#)  
[Lockheed Martin African American Letter Writers to Hewson Lavan.pdf](#)  
[Updated Dr. Reid letter.pdf](#)  
[Deering anaplan pay stub s.pdf](#)  
[Deering Anaplan offer letter.pdf](#)  
[Dr. Reid Psychologist letter 20220217.pdf](#)

---

Attached are the files that should be sent to CasePoint for processing and then production. Please feel free to call me if you have any questions.

Best Regards,

Heidi



**HEIDI J.K. FESSLER**

[hfessler@innovalawgroup.com](mailto:hfessler@innovalawgroup.com)

651-278-3895

[www.innovalawgroup.com](http://www.innovalawgroup.com)

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**From:** Kaarin Nelson Schaffer <[Kaarin@conardnelson.com](mailto:Kaarin@conardnelson.com)>

**Sent:** Tuesday, November 15, 2022 6:32 AM

**To:** Heidi J.K. Fessler <[hfessler@innovalawgroup.com](mailto:hfessler@innovalawgroup.com)>; Erin Quist <[erin@conardnelson.com](mailto:erin@conardnelson.com)>; Bill Egan <[began@avisenlegal.com](mailto:began@avisenlegal.com)>

**Subject:** RE: Amended Initial Disclosures

[REDACTED]

**EXHIBIT**

**J**

**From:** [Shivendra Prasad](#)  
**To:** [erin@conardnelson.com](mailto:erin@conardnelson.com)  
**Cc:** [Heidi J.K. Fessler](#); [kaarin@conardnelson.com](mailto:kaarin@conardnelson.com); [began@avisenlegal.com](mailto:began@avisenlegal.com)  
**Subject:** Re: CP #122032: Upload to CasePoint - Daniel'la Deering v. Lockheed Martin Corporation, Court File No.: 20-cv-1534 (DSD/BRT) - [#122032]  
**Date:** Thursday, November 17, 2022 11:54:38 AM

---

No problem Erin, we will analyze the data and will send you the loading specs soon.

Warm regards,  
--

**Shivendra Prasad**  
**Sr. Project Support Analyst, Client Services**

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On Thu, 17 Nov at 12:48 PM , Erin <[erin@conardnelson.com](mailto:erin@conardnelson.com)> wrote:  
Good morning,

Please see attached for the documents that are needing to be uploaded into CasePoint regarding Daniel'la Deering v. Lockheed Martin Corporation et al.

Custodian of Records: Daniel'la Deering

- Deering anaplan pay stub s
- Deering Anaplan offer letter
- Dr. Reid Psychologist\_letter 20220217
- Lavan annual appointment of me to corp secretary for my division 2013
- Lavan corp secretary appointments 2013 and 2016
- Lockheed Martin African American Letter Writers to Hewson Lavan
- Updated Dr. Reid letter

Custodian of Records: William Egan

- 20221031144901069

Please let me know if you have any questions or concerns regarding the attached documentation. I am new to using CasePoint and just had my training this morning, so I apologize if I have forgotten information needed for an easy upload.

Kind Regards,

**Erin D. Quist**

Paralegal | 121 South 8<sup>th</sup> Street | Suite 1425 | Minneapolis, MN 55402





Phone: (612) 808-9827 | E-mail: [erin@conardnelson.com](mailto:erin@conardnelson.com)  
Website: [www.conardnelson.com](http://www.conardnelson.com)



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**From:** Shivendra Prasad  
**To:** [erin@conardnelson.com](mailto:erin@conardnelson.com)  
**Cc:** [Heidi J.K. Fessler](mailto:Heidi.J.K.Fessler@conardnelson.com); [kaarin@conardnelson.com](mailto:kaarin@conardnelson.com); [began@avisenlegal.com](mailto:began@avisenlegal.com)  
**Subject:** Re: CP #122032: Upload to CasePoint - Daniel'la Deering v. Lockheed Martin Corporation, Court File No.: 20-cv-1534 (DSD/BRT) - [#122032]  
**Date:** Thursday, November 17, 2022 12:23:08 PM

Hi Erin,

We will proceed according to the instructions listed below and let you know as soon as these documents become available for review in your database. If we have any additional questions along the way, we will be sure to reach out!

**Note:** As this data set is too small and if you have a large dataset to be uploaded then, the best way to upload the docs onto SFTP site in a compressed format, we will set up the SFTP account for you and will let you know.

**Data received:**



Data Processing	
Task Initiation Particular	Details
Original Path	Via email
Custodian Name	Custodian for file <b>20221031144901069.pdf</b> is : <b>William Egan</b> And for rest of docs custodian is: <b>Daniel'la Deering</b>
Next Sequence Number	Next REV#
Time zone	DB Default
Deduplication	DB Default
Promote to Store	REVIEW
Promote including Duplicates?	No
Foldering Instructions	Standard
Delete Original Copy from ARAPREP/ORG folder	Yes
Delete Container Files	Yes
Indexing (ES/DT/ES & DT Both)	ALL
Received Data Size	4.46 MB
Priority	Normal (ETA between 24 to 48 Hours*).
Approximate Billable Time	1.5 to 3 Hours* (0-1 GB)
Due Date / Time	11/17/2022: 10:00 PM
Special Instructions	None
* Delivery times may be impacted by data size, data type, data conditions, and current queue workload. If delivery times need to be extended, a Casepoint team member will advise as soon as possible.	

Warm regards,

--



Shivendra Prasad  
Sr. Project Support Analyst, Client Services

-----  
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*To ensure that all of your requests are addressed in a timely manner and tracked appropriately, please kindly **submit all requests** TO: [mycasepoint@casepoint.com](mailto:mycasepoint@casepoint.com). If your request is after hours and urgent, please include **URGENT** in the subject line.*

On Thu, 17 Nov at 12:54 PM , Kaarin Nelson Schaffer <[kaarin@conardnelson.com](mailto:kaarin@conardnelson.com)> wrote:  
Hello. I am out of the office with limited access to email until Monday, November 21st. I will respond as quickly as possible but if you need immediate assistance please reach out to Erin Quist at [erin@conardnelson.com](mailto:erin@conardnelson.com). Thank you.

Kaarin

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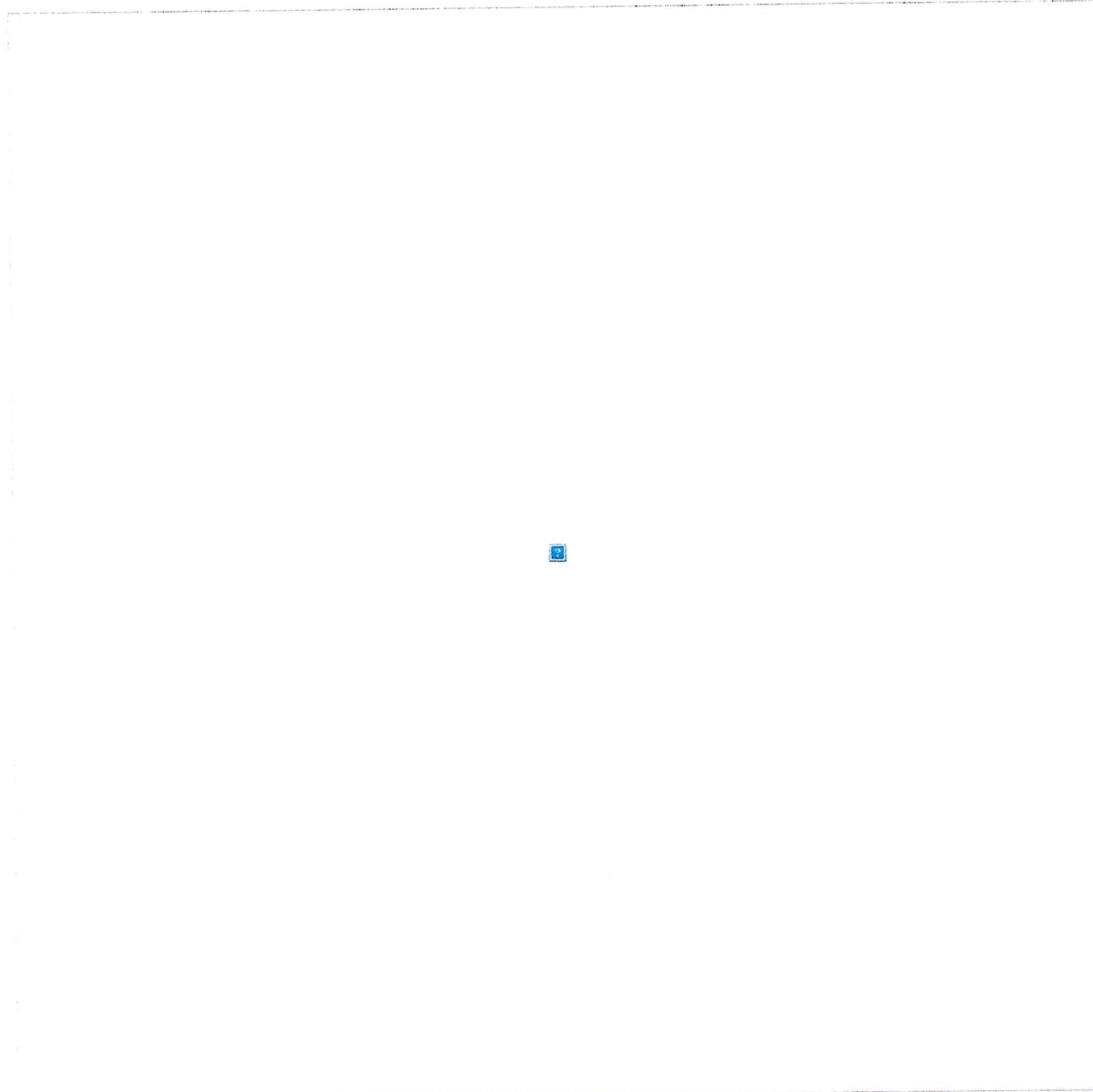
**From:** [Shivendra Prasad](#)  
**To:** [erin@conardnelson.com](#)  
**Cc:** [Heidi J.K. Fessler](#); [kaarin@conardnelson.com](#); [Bill Egan](#)  
**Subject:** Re: CP #122032: Upload to CasePoint - Daniel/la Deering v. Lockheed Martin Corporation, Court File No.: 20-cv-1534 (DSD/BRT) - [#122032]  
**Date:** Thursday, November 17, 2022 3:15:14 PM

---

Hi Erin,

The documents have been loaded into the database and they are ready for your review.

Below is the screenshot verifying the requested folder structure.



Below are the completed processing/loading specifications for your review as well:

Data Processing - Task Complete	
Task Type	CE - DM - Data Processing
Dataset Name	DS00110 - 11172022EMAILA
Document Count	8
Page Count	0
Duplicate Count	0
DocID Range	REV000000628 - REV000000635
Blank Body MSG Count	0
Long Thread MSG Count	0
TIFF Template	NA



Indexing (DT/ES)	Done
Non-Indexed Count	0
SIMX (Nr. Duplicate/Email Threading)	Done
Custodian Breakdown	William Egan : 1 Daniel'la Deering : 7

Please let us know if you have any questions:-)

Warm regards,

--

Shivendra Prasad  
Sr. Project Support Analyst, Client Services

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On Thu, 17 Nov at 1:41 PM, Shivendra Prasad <[mycasepoint@casepoint.com](mailto:mycasepoint@casepoint.com)> wrote:  
Hi Heidi,

Thanks for the confirmation, we will not setup the SFTP account for him, please let us know if it needed in the future.

Warm regards,

--

Shivendra Prasad  
Sr. Project Support Analyst, Client Services

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To ensure that all of your requests are addressed in a timely manner and tracked appropriately, please kindly submit all requests TO: [mycasepoint@casepoint.com](mailto:mycasepoint@casepoint.com). If your request is after hours and urgent, please include URGENT in the subject line.

On Thu, 17 Nov at 1:36 PM, Heidi Fessler <[hfessler@innovalawgroup.com](mailto:hfessler@innovalawgroup.com)> wrote:  
We do believe that this will be the last data set loaded to the platform.

Best Regards,

Heidi



HEIDI J.K. FESSLER  
[hfessler@innovalawgroup.com](mailto:hfessler@innovalawgroup.com)  
651-278-3895  
[www.innovallawgroup.com](http://www.innovallawgroup.com)

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From: Shivendra Prasad <[mycasepoint@casepoint.com](mailto:mycasepoint@casepoint.com)>

Sent: Thursday, November 17, 2022 12:23 PM

To: [erin@conardnelson.com](mailto:erin@conardnelson.com)

Cc: Heidi J.K. Fessler <[hfessler@innovalawgroup.com](mailto:hfessler@innovalawgroup.com)>; [kaarin@conardnelson.com](mailto:kaarin@conardnelson.com); [began@avisenlegal.com](mailto:began@avisenlegal.com)

Subject: Re: CP #122032: Upload to CasePoint - Daniel'la Deering v. Lockheed Martin Corporation, Court File No.: 20-cv-1534 (DSD/BRT) - [#122032]

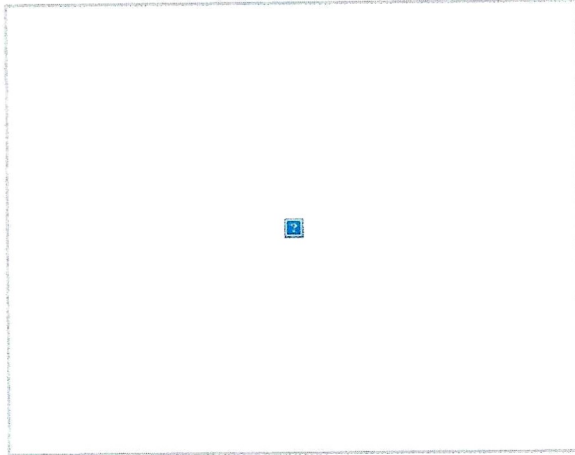
Hi Erin,

We will proceed according to the instructions listed below and let you know as soon as these documents become available for review in your database. If we have any additional questions along the way, we will be sure to reach out!

**Note:** As this data set is too small and if you have a large dataset to be uploaded then, the best way to upload the docs onto SFTP site in a compressed format, we will set up the SFTP account for you and will let you know.

Data received:





Data Processing	
Task Initiation Particular	Details
Original Path	Via email
Custodian Name	Custodian for file <b>20221031144901069.pdf</b> is : <b>William Egan</b> And for rest of docs custodian is: <b>Daniel'la Deering</b>
Next Sequence Number	Next REV#
Time zone	DB Default
Deduplication	DB Default
Promote to Store	REVIEW
Promote including Duplicates?	No
Folding Instructions	Standard
Delete Original Copy from ARAPREP/ORG folder	Yes
Delete Container Files	Yes
Indexing (ES/DT/ES & DT Both)	ALL
Received Data Size	4.46 MB
Priority	Normal (ETA between 24 to 48 Hours*).
Approximate Billable Time	1.5 to 3 Hours* (0-1 GB)
Due Date / Time	11/17/2022: 10:00 PM
Special Instructions	None
* Delivery times may be impacted by data size, data type, data conditions, and current queue workload. If delivery times need to be extended, a Casepoint team member will advise as soon as possible.	

Warm regards,  
--

**Shivendra Prasad**  
Sr. Project Support Analyst, Client Services

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On Thu, 17 Nov at 12:54 PM, Kaarin Nelson Schaffer <[kaarin@conardnelson.com](mailto:kaarin@conardnelson.com)> wrote:

Hello. I am out of the office with limited access to email until Monday, November 21st. I will respond as quickly as possible but if you need immediate assistance please reach out to Erin Quist at [erin@conardnelson.com](mailto:erin@conardnelson.com). Thank you.

Kaarin

**Notice of Confidentiality**

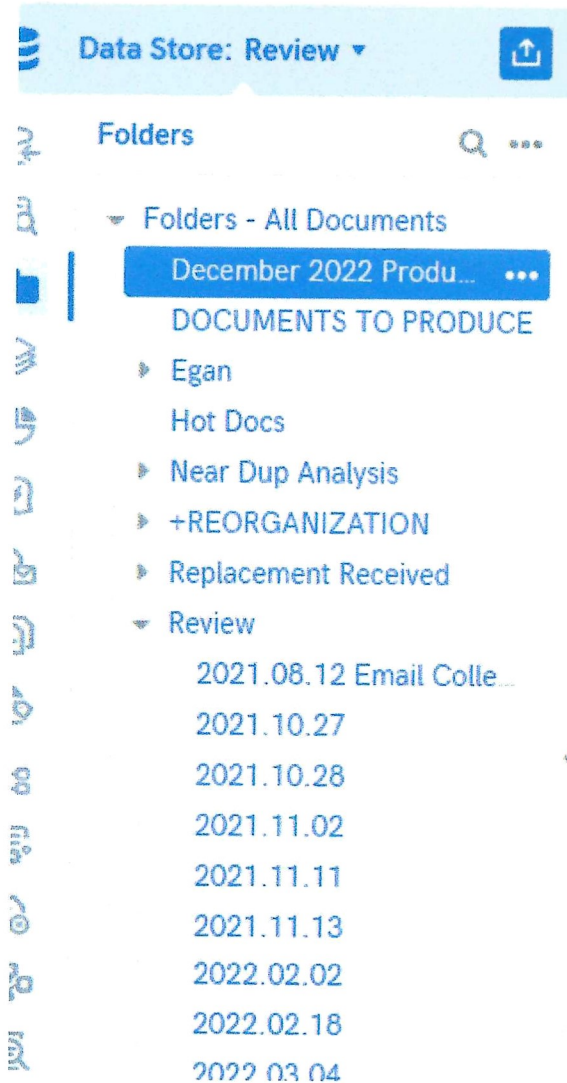
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**From:** [Heidi J.K. Fessler](#)  
**To:** [Erin Quist](#)  
**Date:** Thursday, December 1, 2022 12:39:00 PM  
**Attachments:** [image001.png](#)  
**Sensitivity:** Confidential

---



Best Regards,

Heidi



**HEIDI J.K. FESSLER**

[hfessler@innovalawgroup.com](mailto:hfessler@innovalawgroup.com)

651-278-3895



**From:** [Erin Quist](#)  
**To:** [April Bermudez](#)  
**Cc:** [Kaarin Nelson Schaffer](#); [Bill Egan](#); [Heidi J.K. Fessler](#)  
**Subject:** Production to be Ran 2022.12.01  
**Date:** Thursday, December 1, 2022 2:05:38 PM  
**Attachments:** [image001.png](#)  
[Deering Production 2022.12.01.png](#)

---

Good afternoon,

Please get documents included in the folder "December 2022 Production Set" ready for production using the last bates number from our previous production. 7 documents are within the folder and Doc ID REV00000628 is tagged as redacted.

Please contact our office with any questions or concerns or if I have forgotten any information needed for the production to be ran. Attached is a screenshot of the folder where the documents are located.

Kind Regards,

**Erin D. Quist**

Paralegal | 121 South 8<sup>th</sup> Street | Suite 1425 | Minneapolis, MN 55402

Phone: (612) 808-9827 | E-mail: [erin@conardnelson.com](mailto:erin@conardnelson.com)

Website: [www.conardnelson.com](http://www.conardnelson.com)



**EXHIBIT**

**O**

**From:** Sandip Parmar  
**To:** erin@conardnelson.com  
**Cc:** kaarin@conardnelson.com; began@avisenlegal.com; Heidi J.K. Fessler  
**Subject:** Re: CP #122988: Production to be Ran 2022.12.01 - [#122988]  
**Date:** Thursday, December 1, 2022 4:58:47 PM

Hi Erin,

This production has been completed and has been uploaded to the Casepoint FTP share for you to access. All bates stamped images and production values have been updated in the database as well for your review.

Casepoint has shared a file for you to access. Please click on the secure link provided below to access and download the data.

Shareable FTP Link	
FTP Link	<a href="https://sftp.casepoint.com/public/file/X08vozaXME_3lwm0p4MfbQ/DD">https://sftp.casepoint.com/public/file/X08vozaXME_3lwm0p4MfbQ/DD</a>
FTP Link Password	UI%-VvxL3M
ZIP File Password	XvzVt10a
The Link Expires On:	12/16/2022 5:38 PM

Please see below for the completed production specifications:

Data Production - Task Complete	
Media Label	December 2022 Production Set
Dataset Name	December 2022 Production Set
Location/FTP Path	FTP Link
Volume Name	DD011
Volume Password	XvzVt10a
Bates Range	DD00003553 - DD00003564
Document Count	7
Production Page Count	12
No of Endorsements	12
Native Count	0
Redacted Count	1
OCR Page Count	12
Native Production Page Count	0
Placeholder Count	0
Load Files	Searchable PDFs
High Page Count - Top 5	1. DD00003555 .pdf 4
	2. DD00003553 .pdf 2
	3. DD00003561 .pdf 2
	4. DD00003559 .pdf 1
	5. DD00003560 .pdf 1

Thanks & Regards,  
**Sandip Parmar**  
 Project Support Analyst, Client Services

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On Thu, 1 Dec at 3:55 PM, Sandip Parmar <[mycasepoint@casepoint.com](mailto:mycasepoint@casepoint.com)> wrote:  
 Hi Erin,

We have completed our pre-production QCs, we will proceed according to the instructions listed below and let you know as soon as this production becomes available. If we have any additional questions or confirmations needed before starting we will be sure to reach out.

**EXHIBIT**  
**P**



If anything below requires modifications - please let us know at your earliest convenience.

We are following specifications from the previous production.

**Production Coding Confirmations:**



**Production Specifications:**

Data Production	
Task Initiation Notification	Details
Data Set (Source Folder Name)	December 2022 Production Set
Document Count	7
Image Conversion Format (Color/Black and White)	Already Imaged
Volume Name	DD011
Starting Bates Number	DD00003553
Redacted Document Count	1
Withhold metadata for Redacted (Yes/No)	N/A
Designation Details (Confidentiality Details - Language & Document Count)	Confidential (All) As per the previous production.
Privilege Document Count (If these are to be provided as placeholders)	0
Withhold metadata/Text/Image/Native for Privilege (Yes/No)	N/A
Native Placeholder Details	N/A
Exception Placeholder Details	N/A
Native Count	0
Production Sort Order	Doc ID
Is Family Broken? (Yes/No)	No
Production Output Type (PDFs - Searchable/Non-Searchable, Load Files as per ESI)	Searchable PDFs
Production ESI Specs/Document-	N/A
Export Field List	N/A
Delivery Method (Download from Casepoint / Client FTP / Forwardable FTP Link)	Forwardable FTP Link
Production Package Expiration (24 Hrs, 7 Days, 30 Days, No Expiration)	N/A
Priority	Normal (ETA between 24 to 48 Hours*)
Approximate Billable Time	2 to 3.5 Hours* (0 - 1000 images)
Special Instructions	None

Thanks & Regards,

**Sandip Parmar**

Project Support Analyst, Client Services

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On Thu, 1 Dec at 3:10 PM, Sandip Parmar <mycasepoint@casepoint.com> wrote:

Hi Erin,



Your request has been received. We will start with our pre-production QC and let you know if we have any questions along the way.

Thanks & Regards,  
**Sandip Parmar**  
Project Support Analyst, Client Services

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On Thu, 1 Dec at 3:05 PM , Erin <[erin@conardnelson.com](mailto:erin@conardnelson.com)> wrote:  
Good afternoon,

Please get documents included in the folder "December 2022 Production Set" ready for production using the last bates number from our previous production. 7 documents are within the folder and Doc ID REV00000628 is tagged as redacted.

Please contact our office with any questions or concerns or if I have forgotten any information needed for the production to be ran. Attached is a screenshot of the folder where the documents are located.

Kind Regards,

**Erin D. Quist**

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Phone: (612) 808-9827 | E-mail: [erin@conardnelson.com](mailto:erin@conardnelson.com)  
Website: [www.conardnelson.com](http://www.conardnelson.com)



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